

McElroy Deutsch

1300 Mount Kemble Avenue
P.O. Box 2075
Morristown, NJ 07962-2075
T: 973.993.8100 | F: 973.425.0161
MDMC-LAW.COM

JAMES J. O'HARA
973-425-8661
johara@mdmc-law.com

November 3, 2023

Via ECF

The Honorable Michael A. Hammer,
United States Magistrate Judge
Martin Luther King, Jr. Federal Building
And Courthouse, 2nd Floor
50 Walnut Street
Newark, New Jersey 07102

Re: *Bianchi v. Samsung Electronics America, Inc. et al.*
Civil Action No.: 2:17-cv-01263-CCC-MAM

Dear Judge Hammer:

This firm represents defendant, Samsung Electronics America, Inc. ("SEA"), in the above-referenced matter. As per Your Honor's direction in the Order of October 2, 2023, we are providing a joint status report.

We are pleased to report that the parties have now received responses to the final round of settlement offers discussed in our last update in September. This clears the way for individual settlements with customers who were identified as potentially part of Plaintiffs' putative class. A final email to the identified settling customers will be sent out today, November 3, 2023, to have them execute their acceptance electronically. Thereafter, each settling customer will receive the relief they were offered and accepted based on their circumstances. The parties wish to complete the process prior to marking the case settled. We respectfully request, therefore, that Your Honor allow us to report back on December 22, 2023.

Respectfully,

/s/James J. O'Hara

JAMES J. O'HARA

On behalf of Defendant,

Samsung Electronics America, Inc.

Respectfully,

/s/Jonathan Shub

JONATHAN SHUB

On behalf of Plaintiffs

Cc: Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.)